

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:

**LECLAIRRYAN PLLC,

Debtor.**

Chapter 7

Case No. 19-34574 (KRH)

**Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,**

vs.

Adv. Proc. No. 20-03142-KRH

**ULX Partners, LLC, UnitedLex
Corporation, and ULX Manager, LLC

Defendants.**

**ULX PARTNERS, LLC'S, UNITEDLEX CORPORATION'S,
AND ULX MANAGER, LLC'S
MOTION FOR SUMMARY JUDGMENT**

Defendants ULX Partners, LLC (“ULXP”), UnitedLex Corporation (“UnitedLex”), and ULX Manager, LLC (“ULXM”) (collectively, the “ULX Entities” or “Defendants”), by counsel, pursuant to Federal Rule of Civil Procedure 56, as made applicable herein by Rule 7056 of the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 7056-1, hereby move this Court for entry of summary judgment in their favor and against Lynn A. Tavenner, in her capacity as Chapter 7 Trustee (the “Plaintiff” or the “Trustee”) of the bankruptcy estate of LeClairRyan PLLC, with respect all claims asserted against the Defendants by the Trustee in her First Amended Complaint in this matter (the “Amended Complaint”) [Docket No. 86]. The facts and grounds in

support of this Motion for Summary Judgment are set forth in the accompanying Memorandum in Support of Their Motion for Summary Judgment filed contemporaneously herewith.

RESERVATION OF RIGHTS

Defendants respectfully preserve their objections to this Court's and the District Court's ruling on UnitedLex and ULXP's *Motion to Withdraw the Reference* and related pleadings. In addition, Defendants respectfully reserve the right to file a renewed Motion to Withdraw the Reference with respect to the First Amended Complaint. Accordingly, and pursuant to Fed. R. Bankr. P. 7012(b), Defendants respectfully state that they do not consent to the entry of final orders or judgment by the Bankruptcy Court.

Dated: January 28, 2022

Respectfully submitted,

/s/ Thomas J. McKee, Jr.

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Counsel to the ULX Entities

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January, 2022, I served a true and correct copy of the foregoing document via the Court's ECF system upon:

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